

1 AARON D. FORD
Attorney General
2 GEORDAN GOEBEL (Bar No. 13132)
Senior Deputy Attorney General
3 State of Nevada
Office of the Attorney General
4 100 North Carson Street
Carson City, Nevada 89701-4717
5 Telephone: (775) 684-1200
Fax: (775) 684-1108
6 ASage@ag.nv.gov
Attorney for Respondents
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 RICHARD L. VANHORN,

11 Petitioner(s),

12 vs.

13 B. WILLIAMS, *et al.*,

14 Respondent(s).

Case No. 2:17-cv-00960-RFB-VCF

**MOTION FOR ENLARGEMENT OF TIME
(FIRST REQUEST)**

15 Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada,
16 hereby respectfully move this Court for an order granting a thirty (30) day enlargement of time, to and
17 including May 15, 2019, in which to file and serve their response to Richard VanHorn's habeas corpus
18 petition.

19 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure
20 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and
21 other materials on file herein.

22 Respondents have not previously requested any enlargements of time. This motion is made in
23 good faith and not for the purposes of delay.

24 AARON D. FORD
Attorney General

25 By: /s/ Geordan M. Goebel
26 GEORDAN M. GOEBEL (Bar No. 13132)
27 Deputy Attorney General
28

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Case No. 2:17-cv-00960-RFB-VCF

DECLARATION OF COUNSEL

15 I, Geordan Goebel, hereby states, based on personal knowledge, that the assertions of this
16 declaration are true:

17 1. I am a Deputy Attorney General employed by the Attorney General's Office of the State of
18 Nevada in the Bureau of Criminal Justice, Post-Conviction Division, and I make this declaration on behalf
19 of Respondents' motion for enlargement of time.

20 2. By this motion, I am requesting a thirty (30) day enlargement of time, to and including
21 May 15, 2019, in which to file and serve a response to petitioner Richard VanHorn's (VanHorn) habeas
22 corpus petition. This is my first request for enlargement.

23 3. The response is currently due April 15, 2019.

24 4. I am newly assigned to this case. The additional time requested is necessary as I am
25 endeavoring to complete the review of the voluminous record on appeal, and draft an appropriate
26 response to the petition.

27 5. This motion for enlargement of time is made in good faith and not for the purpose of
28 unduly delaying the ultimate disposition of this case.

1 I, Geordan Goebel, hereby state that the assertions of this declaration are true:

2 1. Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the
3 foregoing is true and correct.

4 Executed on this 12th day of April, 2019.

5 /s/ Geordan M. Goebel

6 GERDAN M. GOEBEL (Bar No. 13132)
Deputy Attorney General

7 IT IS SO ORDERED:

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11 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

12 DATED this 23rd day of April, 2019.
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1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General and that on this 12th day of
3 April, 2019, I served a copy of the foregoing MOTION FOR ENLARGEMENT OF TIME (FIRST
4 REQUEST), by placing said document in the U.S. Mail, postage prepaid, addressed to:

5 Richard VanHorn #80639
6 High Desert State Prison
7 P O Box 650
Indian Springs, Nevada 89070-0650

8 /s/ Laurie Sparman